

United States Senate

WASHINGTON, DC 20510

October 27, 2005

The Honorable Gale Norton
Secretary of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Madam Secretary:

We are writing to express our concerns about ongoing efforts in the Department of Interior to modify the management policies of the National Park Service.

We had deep reservations with the preliminary draft that initiated this process, particularly suggestions to de-emphasize the Park Service's preeminent park protection role and weaken the Park Service's role in protecting against reductions in air quality. We were also extremely concerned about changes to the definition of "impairment."

We are encouraged that the new draft, which was published for public comment on October 19th, includes many improvements from the prior draft. Our preliminary review, however, has turned up some substantive changes of concern and we urge you to give these special attention.

First, we are concerned that despite improvements, the primary mandate of the National Park Service to err on the side of preservation appears to be deemphasized in the draft. At best, this change appears to blur, not clarify, the Park Service's primary responsibility to keep the parks protected for the future. We also are concerned that some changes with the potential for weakening the Park Service's role in protecting park air quality and increasing the potential for inappropriate motorized use in the national parks appear to be retained. We look forward to discussing our concerns with you during the comment period and are pleased that Chairman Thomas will be holding a hearing on this matter in the National Parks Subcommittee.

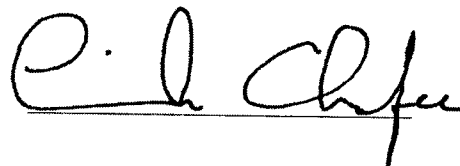
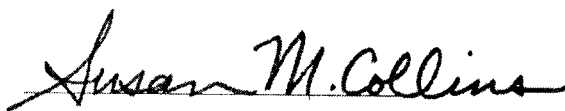
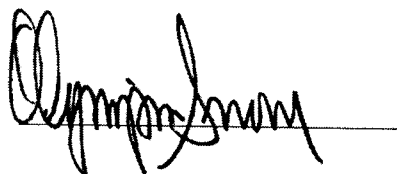
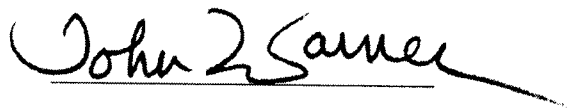
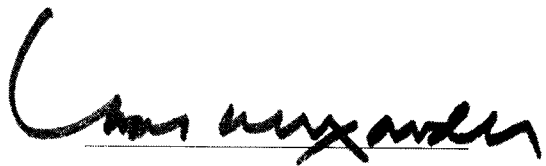
The national parks are cherished by the American people and revered around the world. They are America's cathedrals—living repositories of our history and culture, and places for personal and spiritual reflection. Current management policies, which were last modified only four years ago, provide enormously important guidance to national park managers. Throughout their visits and comments, the American people have let it be known, year after year and by overwhelming margins, that vigorous protection of park resources has enhanced, not encumbered, their enjoyment.

We acknowledge and thank you for the positive changes made in relation to the preliminary draft. We still question, however, the need for requiring the Park Service to change its policies so quickly after publication of the last revision in 2001. The Department's first principle in rewriting Park Service policies should be to do no harm. The test should not be whether these changes improve on the preliminary draft, but whether they protect our national legacy better than the 2001 edition.

The quick process that is unfolding at this time appears inconsistent with that principle and with the need for careful deliberation about possible policy changes. A matter of this importance deserves substantial public dialogue, not merely a brief opportunity for written comments. Over the past 25 years, the Park Service Management Policies have been revised twice – in 1988 during the Reagan Administration, and in 2001 during the Clinton Administration. Both versions underwent much more extensive professional review than the current draft, both were made available to the public for comment for long periods of time, and both were virtually identical in their interpretation of the meaning of the key language of the National Park Service Organic Act.

We request that you move forward with this review in the most open, careful, and deliberate process possible, and allow for broad public input and vetting of these and any other changes. We believe the policies should be crystal clear that the national parks are to be enjoyed only *"in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."*

Sincerely,



cc: The Honorable Pete V. Domenici
The Honorable Jeff Bingaman
The Honorable Craig Thomas
The Honorable Daniel K. Akaka

SENT VIA FAX AND EMAIL

November 30, 2005

Ms. Fran Mainella, Director
National Park Service
1849 C Street NW
Washington DC 20240

Dear Director Mainella:

Each of us was privileged to serve the National Park Service in an executive level leadership position during our careers. We understand the value and importance of management policies to assuring that the National Park System is managed in the way that the Congress and previous generations of Americans intended it to be managed.

Beginning in 1918, when Director Stephen Mather drafted NPS policy subsequently signed by Interior Secretary Lane (often referred to as the "Lane Letter"), policy has undergone periodic revision, while remaining consistent in its intent to implement the Organic Act and subsequent legislation to assure that parks are left unimpaired for future generations.

Now that the set of radical revisions of the 2001 Management Policies proposed by Mr. Hoffman are no longer on the table, the question arises: are the proposed revisions to those 2001 Management Policies sufficiently better to justify scrapping the 2001 Policies and replacing them in their entirety? We think not. They are a drastic and dangerous departure from a longstanding national consensus. The proposed changes are not driven by law, by any conservation need, or by any failure of practical application. Little has changed since the present policies became effective less than five years ago.

While many of us intend to comment, we believe the current process should be terminated. The National Park Service should set in motion a deliberate process that begins with public scoping that explains why sections of the 2001 version should be changed. The reasons cited for the draft changes have been confusing and after-the-fact. Indeed, some of those reasons are contradicted in the new draft. For example, guidance on "base jumping" has been removed (section 8.2.2.7, page 83, 2001 policies). Conversely the oft-mentioned need for a better policy on cell towers has not resulted in any change (section 8.6.4.3 in both documents, page 92, 2001 policies).

We are especially troubled by the omission from the opening sections of the Management Policies of their long-established emphasis upon the NPS's overriding responsibility to preserve resources on behalf of all Americans, including those yet unborn. However, we are also concerned with opening the parks' management decision-making processes to disproportionate influence by special interest groups and local and individual state entities. These are national, not local, parks.

We are heartened that you have stated that, "the policies clearly underscore that when there is a conflict between use and conservation, the protection of the resources will be predominant." And yet, that very statement, which was so clearly articulated in the 2001 Management Policies, has been deleted from Section 1.4.3 of the version currently under consideration and replaced by less compelling language. To make certain that your intention continues as a part of policy, this important language should go back where it belongs.

Any decision to modify NPS policy should be based on the following "principles:"

- Policy should not attempt to rewrite law or regulation. Law should inform policy, not vice-versa.
- The policies should not revise the fundamental interpretation of the Organic Act and its amendments, upheld by over 80 years of implementation and numerous legislative and court actions. The 2001 Management Policies interpret the NPS's responsibility unequivocally: "...the enjoyment by future generations of the national parks can be assured only if the superb quality of park resources and values is

left unimpaired.” Revisions implying a need for the NPS to “balance” conservation with enjoyment, or implying that they are on “an equal plane,” would depart radically from this time-honored emphasis that future enjoyment of the national parks flows from their conservation and that the two are inextricably linked. Such a redirection of park management must not occur.

- Consistent with the above, the policies must adhere to the standard that the impairment of park resources and derogation of values may not be allowed by the Service unless directly and specifically provided for by legislation or by the proclamation establishing a park. Modifying the definition of impairment to something less than what the term means can do nothing but diminish the resources of the National Park System and confuse rather than clarify appropriate management actions by field superintendents on the ground.
- Clear skies and natural soundscapes should continue to be recognized as resource values, rather than “associated characteristics.” These factors are not only important to humans, but also to other species.
- Impairment of visitor enjoyment should not be considered to be as significant as impairment of resources.
- The policies must recognize that there is an enormous difference between “conservation” and “preservation” especially when these terms are applied to cultural resources.
- The standard of “reasonable” should not be replaced by the standard of “demonstrated.”
- The policies in no way should diminish the values and uses of scientific research and scholarly analysis.
- A legislatively authorized activity in a park should not, in and of itself, become a purpose of that park. Just because snowmobiling, grazing or rock climbing might be authorized should not make such activities purposes of the park.
- Advertising and prominent recognition of contributions and support should be avoided if they have the effect of reducing the vital contrast between the park experience and the daily routines and experiences that many visitors seek to leave behind.
- Protection of resources must take priority over the scheduling of events, of any kind, that have entertainment as their primary purpose.

There are improvements that may be made to the 2001 Management Policies, and they can be made in the traditional, conventional way by amending the policies one by one – bottom up – not top down, and not radically.

Sincerely,

The following former executive level leaders of the National Park Service have agreed to have their names added as signatories to this letter:

Bill Briggie
Deputy Director
1975-1977

Herb Cables
Deputy Director
1989-1993

Denis P. Galvin
Deputy Director
1985-1989; 1997-2002

Robert Arnberger
Regional Director
2000-2003

Robert M. Baker
Regional Director
1994-1997

Bob Barbee
Regional Director
1994-2000

Glen Bean
Regional Director
1977-1980

Jerry Belson
Regional Director
1996-2003

Chet Brooks
Regional Director
1971-1976

Don Castleberry
Regional Director
1987-1994

Jim Coleman
Regional Director
1981-1994

Jim L. Dunning
Regional Director
1979-1983

Barbara J. Griffin
Regional Director
1993-1995

Lorraine (Mintzmyer) Denning
Regional Director
1979-1992

Jack Morehead
Regional Director
1991-1994

Gerald D. Patten
Regional Director
1989-1990

Joseph C. Rumburg, Jr.
Regional Director
1974-1976

Dave Thompson
Regional Director
1970-1977

Karen Wade
Regional Director
1999-2003

Maureen Finnerty
Associate Director
1994-2000

Joe Gorrell
Associate Director
1988-1995

Jerry Rogers

Associate Director
1982-1994

Caleb G. Cooper
Center Director
1991-1995

Gary Cummins
Center Director
1997-2005

Marc Sagan
Center Director
1974-1986



September 8, 2005

The Honorable Gale Norton
Secretary of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Norton:

Outdoor Industry Association, representing our 1100 outdoor business members, is deeply concerned about proposed revisions to the National Park Service's core mission and fundamental policies, which could harm the very landscapes and natural icons that define America.

The National Park System was established to protect our natural and cultural treasures. For the past 90 years, management of the nation's national parks has afforded these landscapes a high level of natural resource protection, with the overwhelming support of the American people. To this end, the Park Service has been charged by congressional mandate and case law with maintaining parks "unimpaired" for future generations. This has rightfully meant that NPS policy has held protection and preservation as their highest goals.

OIA and its member companies and associations cannot support changes to National Park policy which would:

- Compromise the feeling of quiet awe and contemplation that visitors seek in enjoying our national treasures.
- Reduce scientific reasoning in management of park resources.
- Weaken protections for air quality, water and wildlife.
- Increase commercial development of National Parks
- Reduce the quality of outdoor experiences for hikers, paddlers and campers in National Parks.
- Designate mining and grazing as primary "park purposes."

It has been reported that this document was resoundingly rejected by every NPS regional director in the country and that it was prepared without the consultation of the people who manage the parks on a daily basis. We are certain that the public will be very interested in learning more about this process now that it has come to light.

High standards are required for National Parks. They are the crown jewels, the places that define America. The American people will not forgive us if we harm them or reduce the quality of their experiences in them.

We look forward to hearing directly from the Department of Interior about the plans for these revisions and the reasoning behind "fixing" a system that has captured the public's imagination and protected these landscapes for the past 90 years.

Sincerely,

Frank Hugelmeyer, President
Outdoor Industry Association
Boulder, CO

Will Manzer, President and CEO
Eastern Mountain Sports
Peterborough, NH

Skip Yowell, Vice President
Jansport
Appleton, WI

Brian Cousins, President
Cloudveil Mountain Works, Inc.
Jackson, WY

Jeff Espy, CEO and Publisher
Hooked on the Outdoors
Duluth, GA

Steve Matous, Executive Director
The Access Fund
Boulder, CO

Keith S. Jackson, President
Industrial Revolution, Inc.
Redmond, WA

Fred Clark, President and CEO
Thule USA
Seymour, CT

Sally Jewell, CEO
Recreational Equipment, Inc.

Lee Fromson, President
Cascade Designs Inc.
Seattle, WA

Chip Coe, President
Smartwool Corporation
Steamboat Springs, CO

Peter Metcalf, CEO, President and
Co-Founder
Black Diamond Equipment
Salt Lake City, UT

Paul Gagner, VP Sales and
Marketing
Gregory Mountain Products
Temecula, CA

Celina Montorfano, Vice President
for Programs
American Hiking Society

Mark J. Herbert, President
Sierra Designs/Ultimate Direction
Louisville, CO

Kenny Ballard, President
Kelty
Boulder, CO

Tom Sherburne, President
Shred Ready, Inc.
Tallassee, AL

Mark Martin, President
Marmot Mountain, LLC
Santa Rosa, CA

Lisa Winston, Owner
Peak Exposure
Boulder, CO

Dunham Gooding, President
American Alpine Institute
Bellingham, WA

David Baker, President
Summit Hut Ltd.
Tucson, AZ

Marty Hiester, Founder
peak62.com
Liberty Lake, WA

Bill Cotton, CEO
Optic Nerve
Edgewater, CO

Smoky Anderson, President
Smoky Anderson, Inc.
Georgetown, CO

Jamie Hogan, Owner
Bear Vault
San Diego, CA

Steve O'Meara, President
Kokatat
Arcata, CA

Ric Nelson , Founder & President
Dermatone Laboratories
Windsor Locks, CT

Claudia Strijek, Owner
Strijek Design
Longmont, CO

Joanne Schwartz, President
Southwind Kayaks
Irvine, CA

Mike Sullivan, President
Sullivan Agency
Wimberley, TX 78676

Susan Osborne, Owner
New River Grill Company
Bradley, WV

David K. Smith, Founder
Future Solutions
Esatto Custom Footwear
Portland, OR

Chris Valiante, Owner
TwentyTwo Designs
Jackson, WY

Chris Warner, Founder and Director
Earth Treks' Climbing Centers
Columbia, MD

Rick Hemmerling, President
Ex Officio
Tukwila, WA

John Telfer, President
Influence Technologies, Inc.
Tustin, CA

John D. Mead, President
Adventure 16
San Diego, CA

Paul Kirwin, CEO
3point5
San Mateo, CA

Ann Krcik, Founder
Extreme Connection
Mill Valley, CA

Harry Gatsch, President
Internet Insights, Inc.
Memphis, TN

Rodney Smith, President
Backpackers Pantry
Boulder, CO

Michael Collins, Publisher
Sea Kayaker Magazine
Seattle, WA

Gil & Mary Willis, Principals
Elk River Touring Center
Slatyfork, WV

Bill Owen, President
Outdoor Specialty Group LLC
Kirkland, WA

Lou Patterson, President
Radar Communications
Boulder, CO

Ned Post, President
Smith Optics
Ketchum, ID

Tom Gordon, President
Great Plains Mountain Stuff
Rocky Mountain Sales Reps

Jeffrey A. Mazer, CFA, Principal
Mazer Advisors, LLC
Boulder, Colorado

Carson Stanwood, Owner
Stanwood & Partners Public
Relations
Jackson Hole, Wyo.

Joe Hyer, Co-Owner
Alpine Experience
Olympia WA

Therese Iknoian, Editor-in-Chief
GearTrends
Grass Valley, CA

Michael Hodgson, Owner
SNEWS LLC
Grass Valley, CA

Menno van Wyk, CEO
Montrail
Seattle, WA

Brice Hoskin, President
Mountain Boy Sledworks
Silverton, CO

Linda Kennedy, President
Watchful Eye Designs, LLC
Park City, UT

Mark Menlove, Executive Director
Winter Wildlands Alliance
Boise, ID

John Liston, President
Liston Concepts
Salt Lake City, UT

Bob Ackerman, President
Brasington's Adventure Outfitters
Gainesville, FL

Sven Lee, Managing Director
Fendler Communications
Portland, ME

Melissa Cook, President
Exel Sports
Georgia, VT

Dale Jones, Co-Owner
New Option Lighting
San Luis Obispo, CA

Stephen E. Nauss, President
Blue Ridge Mountain Sports
Charlottesville, VA

Bob Olsen, President
Peregrine Outfitters Inc
Williston, VT

Mark Hougardy, President
GlyphGuy Backpacks
Sunnyvale, CA

Paul Sanford, Director of Public
Policy
American Canoe Association
Springfield, VA

Lillie Gilbert, President,
Wild River Outfitters, Inc.
Virginia Beach, VA

Sally McCoy, Owner
Silver Steep Partners, LLC
Berkeley, CA

Nick Brown, CEO
Nikwax
Wadhurst, East Sussex, UK

Mike Palmer, Owner
Cascade Speciality LLC
Everett, WA

Brian Vaughan, President
GUsports
Berkeley, CA

Helen Cherullo, Publisher
The Mountaineers Books
Seattle, WA

Loren Dill
Pipestone Mountaineering
Missoula, Mt.

Russ Crispell, President
Association of Outdoor Recreation
and Education (AORE)

cc:
Fran Mainella
Director of the National Park Service